

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

***In re Flint Water Cases.***

\_\_\_\_\_/ **Judith E. Levy**  
**United States District Judge**

**This Order Relates To:**

**ALL CASES**

\_\_\_\_\_/

**NOTICE AND RECOMMENDATION OF THE SPECIAL MASTER AND  
MASTER GUARDIAN AD LITEM REGARDING PROPOSED ORDER  
DIRECTING THE MICHIGAN DEPARTMENT OF HEALTH AND HUMAN  
SERVICES TO PROVIDE SOCIAL SECURITY NUMBERS  
AND INFORMATION ON TERMINATION  
OF PARENTAL RIGHTS AS SPECIFIED HEREIN TO AID IN THE  
IMPLEMENTATION OF THE AMENDED SETTLEMENT AGREEMENT**

On July 31, 2018, under Federal Rule of Civil Procedure 53, the Court appointed Deborah E. Greenspan to serve as a Special Master. Amended Order Appointing Special Master (“Special Master Appointment Order”), ECF No. 544, PageID.16581-16590. On March 19, 2021, the Court appointed Miriam Wolock to serve as Master Guardian ad Litem. Order Granting Plaintiffs’ and Settling Defendants’ Motion to Appoint Master Guardian ad Litem (“MGAL Appointment Order”), ECF No. 1472, Page ID.57740.

On January 21, 2021, the Court issued its *Opinion and Order Granting Plaintiffs’ Motion to Establish Settlement Claims Procedures and Allocation and for*

*Preliminary Approval of Class Settlement Components [1318] and Granting Plaintiffs’ Motion for an Order Adopting the Proposed Motion for Approval of Wrongful Death Settlement [1334]*, ECF No. 1399 (“Preliminary Approval Order”). In the Preliminary Approval Order, the Court appointed Deborah Greenspan as the Special Master under the Amended Settlement Agreement (“ASA”). *Id.* at PageID.54465.

On November 10, 2021, the Court issued its *Opinion and Order Granting Final Approval of a Partial Settlement, Granting Certification of a Settlement Class, Granting Appointment of Settlement Class Counsel [1794], Denying Objections, and Adopting the Report and Recommendation [2006]*, ECF No. 2008 (“Final Approval Order”).<sup>1</sup> The Final Approval Order approved the settlement (“Partial Settlement”) reached between Plaintiffs and the Settling Defendants in the ASA (ECF No. 1394-2, PageID.54120). On January 20, 2022, the Court issued its *Order Regarding Settlement-Related Duties of the Special Master*, ECF No. 2096, PageID.71973. By this Order, the Court amended its previous Special Master Appointment Order and directed Deborah E. Greenspan to fulfill all of the duties of Special Master set forth in the ASA. *See* January 2022 Order, PageID.71975. Pursuant to the ASA and the

---

<sup>1</sup> Unless otherwise defined herein, all capitalized terms herein have the same meaning set forth in the Amended Settlement Agreement that the Court has approved.

Order Regarding Settlement Related Duties of the Special Master, the Special Master oversees various aspects of the settlement, and the Order directs the Special Master to assist the Court in its oversight role by supervising the implementation of the ASA, including, without limitation, supervision and audit of the claims administration process. *See Order Regarding Settlement-Related Duties of the Special Master*, ECF No. 2096, PageID.71975-71976.

The Court also issued a January 26, 2021 *Order Taking Judicial Notice of the Appointment of Next Friends and Ordering Parallel Relief with the Genesee County Circuit Court [1365]*, ECF No. 1405, appointing certain individuals to act as Next Friends for any related Minor or Legally Incapacitated Individuals for purposes of pursuing a claim and recovery under the Amended Settlement Agreement.

Under the terms of the ASA, claimants are required to provide their Social Security Numbers. Ex. 2 of the Amended Settlement Agreement, ECF No. 1394-3, PageID.54214; Ex. 5 of the Amended Settlement Agreement, ECF No. 1394-5, PageID.54232. Roughly 1,200 claimants, who may otherwise be qualified to receive Monetary Awards under the Settlement Agreement, have not, either by the claimants, their parents or guardians, or through their attorneys, provided their Social Security Numbers. Approximately 900 of those claimants are Minors, some of whom might be either Foster Children, Adoptive Children, or Wards of the State and for whom the Michigan Department of Health and Human Services (“MDHHS”)

might have Social Security Numbers. Without knowing whether the MDHHS has Social Security Numbers for the claimants who are Minors, the MDHHS has agreed to search for the Social Security Numbers for the list of claimants that the Special Master will provide. Additionally, under the ASA, parents acting as Next Friends may submit Registration Forms and Claims Materials on behalf of Minors. *See* Paragraph 21.11 of the Amended Settlement Agreement, ECF No. 1394-2, PageID.54187; Paragraph 4 of the Next Friend Order, ECF No. 1405, PageID.54489. Next Friends may be able to access some, or all of the Monetary Awards paid to or put into trust for Minors. The Special Master and Master Guardian ad Litem are aware of situations in which parents, purportedly acting as Next Friends on behalf of Minors, have previously had their parental rights terminated and are therefore not legally eligible to serve as the Next Friend on the basis of their status as a biological parent. Accordingly, such claims must be denied, and the appropriate Next Friend must be identified. The Special Master's office and the Master Guardian ad Litem have identified claims submitted by such ineligible persons – but are aware that there are other such claims. Were such claims to be paid, the payment would be under the control of a person who does not have the legal right to manage the funds allocated for the minor claimant and further such payments will reduce the amount of compensation available for eligible claimants. It is extremely difficult to identify such claims – but MDHHS may be able to assist the Special Master in identifying

such persons – primarily with respect to children who were Foster Children and/or Wards of the State.

The Special Master and Master Guardian ad Litem believe that obtaining this data from MDHHS will allow the claims administrator to finalize claims that are missing information necessary for issuing payments and will help to identify ineligible claims that otherwise could obtain settlement funds inappropriately. Exhibit A to this Notice and Recommendation is a proposed order that would allow the Special Master and Master Guardian ad Litem to obtain this important information and help to facilitate the completion of the claims process. The proposed order has been reviewed and approved by the relevant persons at MDHHS and the Michigan attorney general's office.

The Special Master and Master Guardian ad Litem request that the Court enter the proposed order that is attached as Exhibit A to this Notice and Recommendation.

Date: June 9, 2025

/s/ Deborah E. Greenspan  
Deborah E. Greenspan, Esq.  
Special Master  
BLANK ROME LLP  
Michigan Bar # P33632  
1825 Eye Street, N.W.  
Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201  
[Deborah.Greenspan@blankrome.com](mailto:Deborah.Greenspan@blankrome.com)

/s/ Miriam Z. Wolock  
Miriam Z. Wolock (P49434)

Master Guardian ad Litem  
Law Offices of Miriam Z. Wolock, PLLC  
40900 Woodward Avenue, Suite 100  
Bloomfield Hills, MI 48034  
Telephone: (248) 633-2630  
Facsimile: (248) 633-2631  
[mwolock@wolocklaw.com](mailto:mwolock@wolocklaw.com)

**CERTIFICATE OF SERVICE**

I certify that on June 9, 2025, I electronically filed the foregoing document with the Clerk of the Court using the Court's ECF system, which will send notification of such filing to attorneys of record.

Date: June 9, 2025

/s/ Deborah E. Greenspan  
Deborah E. Greenspan, Esq.  
Special Master  
BLANK ROME LLP  
Michigan Bar # P33632  
1825 Eye Street, N.W.  
Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201  
[Deborah.Greenspan@blankrome.com](mailto:Deborah.Greenspan@blankrome.com)